

LIDMAN LAW, APC

Scott M. Lidman (SBN 199433)
slidman@lidmanlaw.com
Elizabeth Nguyen (SBN 238571)
enguyen@lidmanlaw.com
Milan Moore (SBN 308095)
mmoore@lidmanlaw.com
222 N. Sepulveda Blvd., Suite 1550
El Segundo, California 90245
Tel: (424) 322-4772
Fax: (424) 322-4775

Attorneys for Plaintiff
ERICK CONTRERAS

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
222 N. Sepulveda Blvd., Suite 1550
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2228

Attorneys for Plaintiff
ERICK CONTRERAS

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

ERICK CONTRERAS, as an individual
and on behalf of all others similarly
situated,

Plaintiff,

v.

WORLDWIDE FLIGHT SERVICES,
INC., a Delaware corporation; and DOES
1 through 100,

Defendants.

Case No.: 2:18-cv-06036-PSG-SS

Assigned to: Hon. Judge Philip S.
Gutierrez

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Date: October 7, 2019
Time: 1:30 p.m.
Courtroom: 6A

Action Filed: May 4, 2018
Pre-Trial Conf: April 6, 2020
Trial: April 21, 2020

1 NOTICE IS HEREBY GIVEN that on October 7, 2019, at 1:30 p.m. or as
2 soon thereafter as the matter may be heard in Courtroom 6A of the United States
3 District Court for the Central District of California, located at 350 West 1st Street,
4 Los Angeles, California 90012, before the Honorable Judge Philip S. Gutierrez,
5 Plaintiff Erick Contreras, as an individual and on behalf of all others similarly
6 situated, will and hereby does move this Court for entry of an Order pursuant to
7 Fed. R. Civ. Proc. 23(e) granting:

- 8 1. Preliminarily approval of the proposed Settlement of this lawsuit;
- 9 2. Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure,
10 provisional certification of the following Settlement Classes defined as:
 - 11 a. *Non-Bautista* Class Members: All current and former non-
12 exempt employees who worked in California for Defendant
13 Worldwide Flight Services, Inc. from December 1, 2016
14 through July 25, 2019 and who were not class members in
15 *Guillermo Bautista v. Worldwide Flight Services, Inc.*, Los
16 Angeles Superior Court Case No. BC622372; and
 - 17 b. *Bautista* Class Members: All current and former non-exempt
18 employees who worked in California for Defendant Worldwide
19 Flight Services, Inc. from April 2, 2017 through July 25, 2019
20 and who were class members in *Guillermo Bautista v.*
Worldwide Flight Services, Inc., Los Angeles Superior Court
21 Case No. BC622372.
- 22 3. Preliminarily appointment of Plaintiff Erick Contreras as Class
23 Representative;
- 24 4. Preliminary appointment of Scott M. Lidman, Elizabeth Nguyen, and
25 Milan Moore of Lidman Law, APC and Paul K. Haines of Haines Law
26 Group, APC, as Class Counsel;
- 27 5. Scheduling a final fairness hearing to consider final approval of the
28 Settlement Agreement, entry of a proposed final judgment, Class

Counsel's Motion for Reasonable Attorneys' Fees and Costs, and the
Class Representative Service Award;

6. Appointment of CPT Group, Inc., as the third-party settlement
administrator for mailing notices and otherwise administering the
settlement; and

7. Approval of the proposed Rule 23 Class Notice, and an order that it be
disseminated to the proposed Settlement Classes provided in the
Settlement Agreement.

This Motion is based on this Notice of Motion, the attached Memorandum
of Points and Authorities, the declarations of Scott M. Lidman, Elizabeth Nguyen,
Paul K. Haines, Milan Moore, Erick Contreras, and Julie Green of CPT Group,
Inc. and the exhibits attached thereto, the pleadings and other papers filed in this
action, and on any further oral or documentary evidence or argument presented at
the time of hearing.

Dated: August 14, 2019

Respectfully submitted,
Lidman Law, APC

By: /s/ Elizabeth Nguyen
Elizabeth Nguyen
Attorney for Plaintiff
ERICK CONTRERAS